

KRAMER LEVIN NAFTALIS & FRANKEL LLP

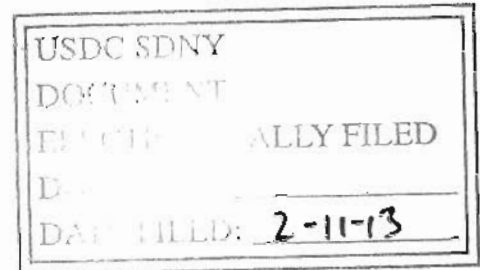
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February 11, 2013

**BY E-MAIL**

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The Honorable Paul A. Crotty  
United States District Judge  
Daniel Patrick Moynihan United States  
Courthouse  
500 Pearl Street  
New York, NY 10007-1312



Re: Kellner, et al. v. U.S. Army Corps of Engineers, et al., 12 Civ. 8458 (PAC)

**SO ORDERED: 2-11-13**

Residents for Sane Trash Solutions, Inc., et al. v.  
U.S. Army Corps of Engineers, et al., 12 Civ. 8458  
(PAC)

*Paul A. Crotty*  
HON. PAUL A. CROTTY  
UNITED STATES DISTRICT JUDGE

Dear Judge Crotty:

We represent the plaintiffs in *Kellner* and are writing on behalf of the plaintiffs in both actions. Plaintiffs' counsel in both actions previously advised Your Honor that we would amend the complaints, and that the deadline for doing so under Rule 15(a) is February 19.

Counsel subsequently learned that the Federal Emergency Management Agency ("FEMA") intends to publish new flooding maps for Manhattan on February 24. Counsel for plaintiffs in both actions believe that these new maps may be relevant to the forthcoming amendments to our complaints. We therefore jointly request that the Court allow a two-week extension, until March 5, 2013, of plaintiffs' time to amend their complaints. This extension would avoid the possibility that plaintiffs would file amended complaints on February 19 and then shortly thereafter seek permission to amend again.

MEMO ENDORSED

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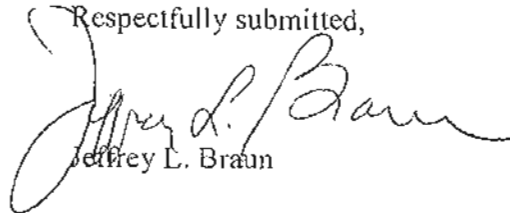
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Plaintiffs have discussed this request with the Assistant U.S. Attorney and the Assistant Corporation Counsel handling these cases for defendants, and they consent to the proposed two-week extension.

Respectfully submitted,



Jeffrey L. Braun

JLB:ar

cc: Christopher K. Connolly, Esq.  
Carrie Noteboom, Esq.  
Charles C. Platt, Esq.  
Albert K. Butzel, Esq.

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